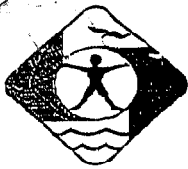


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GOVERNMENT OF PUERTO RICO/OFFICE OF THE GOVERNOR
Environmental Quality Board

March 29, 2000

RECEIVED**MAY 03 2000**PUBLIC WORKS DEPT
ENV ENG DIV

Mr. Pedro Ruiz
Pollution Abatement Program Manager
Environmental Engineering Division
Department of the NAVY
U.S. Naval Station Roosevelt Roads
PSC 1008 Box 3001
FPO AA 34051-0001

RE: SITE CHARACTERIZATION (SITE 2016)
U.S. NAVAL STATION ROOSEVELT ROADS
UST SITE 2016
VIEQUES, P.R.
PR# 02-86-1936

Dear Mr. Ruiz:

The Underground Storage Tank Management Division (USTMD) of the Environmental Quality Board (EQB) received the document *Site Characterization, Site 2016*. The document prepared by CH2HILL presents the horizontal and vertical extension of hydrocarbons on the site where the concentration of total petroleum hydrocarbons (TPH), were above the USTMD limits during the tank removal. This document also includes the potential impact on the soil and groundwater near the area.

The information obtained from the field investigation and laboratory analytical data indicated that the potential for migration of the dissolved petroleum hydrocarbons to environmental receptors is minimal. The soil and groundwater analytical data of the soil borings (SB-2, SB-3, SB-4, and SB-5) and the monitoring wells 2016 MW-2, and 2016 MW-3 were below the USTMD limits. In the soil boring 2016-SB-1 at the former UST location the laboratory analytical results showed TPH concentrations from below the detection limits to 42,000 mg/kg at the soil sample from the 45 to 47 foot interval. In the monitoring well 2016 MW-1 the laboratory analytical results showed a benzene concentration of 17 ug/l which is above the USTMD limits.

Based on the assessment results the Department of the NAVY recommended that no corrective measure be implemented at the site, since the concentrations of the TPH appear to be restricted to the immediate location of the UST based on the results of the analytical data, the slug test, and the low permeability of the impacted soil. The Department of the NAVY supports the biodegradation processes (Natural Attenuation) as a method to reduce hydrocarbon concentrations in the soils and groundwater to cleanup levels.

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After the evaluation of all the information provided to EQB on this particular case, we consider that the use of Monitored Natural Attenuation (MNA) is not an appropriate remedial technology for this site. Based on the results of the laboratory analytical data of the soil and groundwater samples at the soil boring SB-1 and monitoring well 2016 MW-1 indicated that the concentrations were above the USTMD limits. Therefore, the EQB request an additional investigation program to determine the extent of BTEX plume and any potentially toxic transformation products resulting from biodegradation, ensure adequate warning of potential impact to down gradient receptors in addition to verifying the attainment of clean up objectives, and present the corrective action options that could be implemented to remediate the soil and the groundwater at the site.

The information requested must be submitted to the EQB within a period of thirty (30) days from the date this letter is received.

If you have any question on this matter please contact Eng. Brenda Torano of the USTMD at (787) 767-8181 ext. 2631. Also, you can visit our office located at 431 Ponce de León Ave., National Plaza Building, Sixth Floor, Hato Rey, Puerto Rico.

Cordially,



Héctor Russe
Chairman
Environmental Quality Board